



west virginia department of environmental protection

Division of Air Quality
601 57th Street SE
Charleston, WV 25304
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Jim Justice, Governor
Austin Caperton, Cabinet Secretary
www.dep.wv.gov

February 23, 2017

Mary Ann Henderson
17595 Energy Road
Proctor, WV 26055

RE: **Permit Determination PD17-016 - No Permit Needed**
Covestro LLC; Proctor Plant, Marshall County, WV
Plant ID No. 051-00009; Determination No. PD16-070

Dear Ms. Henderson:

The Division of Air Quality (DAQ) has determine that a permit will **NOT** be required under 45CSR13 for your proposed Phase 1, 2 and 3 Extruder Line #1 Replacement Project.

This determination is based on the information submitted in your permit determination form dated February 16, 2017 and received on the following day, which indicates that the increase in emissions resulting from the project:

- will not exceed the threshold limits listed in section 2.17 of 45CSR13:

VOCs < 6 lb/hr, < 144 lb/day and < 10 TPY
HAPs < 2 lb/hr and < 5 TPY

- does not exceed any existing Rule 13 permit limits.

(Note if there had been existing Rule 13 permit limits related to the proposed project, a class II administrative update would have been the appropriate mechanism through which to have updated such limits.)

As was discussed in both of Covestro's permit determinations (PD16-070 and PD17-016), the emissions increase resulting from the proposed project does, however, necessitate changing certain non-facility-wide HAP requirements/limits that were placed in the Title V permit in order to make the facility a synthetic HAP minor. **It is therefore Covestro's responsibility to submit to the DAQ an application for a significant modification to the Title V permit to make the necessary changes resulting from the proposed project.**

Please bear in mind, however, that any additional changes to the proposed facility may require a permit under 45CSR13. Furthermore, pursuant to 45CSR13-5.14, records briefly describing the proposed change, the pollutants involved, the potential to emit for each pollutant

increased or added shall be maintained by the owner or operator for at least two years and made available to the Director upon request. Should you have any questions, please contact the undersigned engineer at (304) 926-0499 Ext. 1257.

Sincerely,



John Legg
DAQ Permit Writer

c: Carrie McCumbers, DAQ Title V Permit Supervisor

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